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Rands & South, Ltd.*

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

CENTURY-NATIONAL INSURANCE
COMPANY, a California corporation, PACIFIC
PIONEER INSURANCE GROUP, INC., a
Delaware corporation, PACIFIC PIONEER
INSURANCE COMPANY, a California
corporation, and UCA GENERAL
INSURANCE SERVICES, a California
corporation,

Plaintiffs,

v.

DOUGLAS J. GARDNER, ESQ., an individual,
DOUGLAS J. GARDNER, LTD., a Nevada
domestic professional corporation, Rands &
SOUTH, LTD., a Nevada domestic
professional corporation, ALPS
CORPORATION, a Montana corporation,
DOES 1 through 20, inclusive.

Defendants.

CASE NO.: 2:18-cv-02090-APG-PAL

**STIPULATION AND ORDER TO
EXTEND TIME TO FILE JOINT
PRETRIAL ORDER**

(THIRD REQUEST)

Plaintiffs, CENTURY-NATIONAL INSURANCE COMPANY, PACIFIC PIONEER
INSURANCE GROUP, INC., PACIFIC PIONEER INSURANCE COMPANY, and UCA

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1 GENERAL INSURANCE SERVICES and Defendant, DOUGLAS J. GARDNER, ESQ.,
2 DOUGLAS J. GARDNER, LTD, and RANDS & SOUTH, LTD., by and through their
3 respective counsel, hereby agree and stipulate as follows:

4 This action arises from a dispute over Plaintiffs' claims of legal malpractice,
5 breach of contract, and fraud in the defense to judgment and post-judgment settlement
6 of a multi-million dollar underlying action for personal injury damages.

7 On October 12, 2021, the Court granted (ECF No. 114) the Parties' First
8 Request for Stipulation and Order to Extend Deadline to File Joint Pre-Trial Order (ECF
9 No. 113), to accommodate the Parties' attempts to resolve this action through
10 mediation.

11 The Parties' First Request stipulated to extend the Joint Pre-Trial Order deadline
12 to 30 days after completion of mediation.

13 The Parties participated in and completed an all-day mediation on January 27,
14 2022, before the Honorable Judge Jackie Glass (Ret.) of Advanced Resolution
15 Management. The Parties did not settle their disputes or resolve the instant litigation
16 through mediation. The Joint Pre-Trial Order deadline was therefore Saturday, February
17 26, 2022.

18 On February 22, 2022, the Court granted (ECF No. 126) the Parties' Second
19 Request for Stipulation and Order to Extend Deadline to File Joint Pre-Trial Order (ECF
20 No. 125), to facilitate the Parties' efforts in meeting and conferring on and preparing a
21 thorough Joint PreTrial Order that addresses the extensive number of issues and
22 evidence to be addressed at trial. The Joint Pre-Trial Order deadline was therefore
23 Monday, March 28, 2022.

24 Wherefore, the Parties now stipulate that the present deadline for filing the Joint
25 Pretrial Order, currently due on Monday, March 28, 2022, be extended one (1) week to
26 **Monday, April 4, 2022.** The reason for the one (1) week extension is that David A.
27 Clark, counsel for Defendants Douglas J. Gardner, Esq., Douglas J. Gardner, Ltd., and
28 Rands & South, Ltd., has been deadling with a family issue which has now resolved.

Mr. Clark has requested additional time in order to prepare the Gardner Defendants' portion of the Joint Pretrial Order and to meet-and-confer with other counsel. This is the parties' third request for extension and is their way of accommodating each other. The parties certify that this Stipulation is made in good faith and is not sought for the purpose of undue delay or to cause prejudice to any party.

IT IS SO STIPULATED.

DATED this 23rd day of March, 2022.

PYATT SILVESTRI

LIPSON NEILSON P.C.

/s/ John A. Marshall

/s/ David A. Clark

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Century-National Insurance Company v. Douglas J. Gardner, Esq., et al.
Case No.: 2:18-cv-02090-APG-PAL

ORDER

Based on the foregoing stipulation of the parties and for good cause appearing,
IT IS HEREBY ORDERED that the deadline for filing the Joint Pretrial Order shall
be, and the same is hereby, extended one (1) week, from Monday, March 28, 2022, to
Monday, April 4, 2022.

IT IS SO ORDERED.

DATED: March 24, 2022


UNITED STATES DISTRICT JUDGE

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